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Defendant Pro Se

**FILED**  
Clerk  
District Court

**DEC 07 2021**

for the Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

DISTRICT COURT FOR THE  
NORTHERN MARIANA ISLANDS

ABU YOUSUF and MD. ROKONNURZZAMAN,

Civil Action No. 1:21-cv-00015

Plaintiffs,

vs.

**ANSWER**

LONGFENG CORPORATION *dba* NEW XO  
MARKET and PARTY POKER, GUOWU LI,  
XU GUI QING, and Feloteo V. Ranada  
*dba* NVM ENTERPRISES, jointly and severally,

Defendants.

**NOW COMES** Defendant Feloteo V. Ranada ("Ranada"), pro se, and for his Answer states as follows:

**INTRODUCTION**

1. Admits paragraph 1 of the First Amended Complaint.

**JURISDICTION AND VENUE**

2. Admits paragraph 2 of the First Amended Complaint. This Court has this jurisdiction pursuant to 48 U.S.C. § 1822(a).
3. Admits paragraph 3 of the First Amended Complaint.
4. Admits paragraph 4 of the First Amended Complaint.

5. Admits paragraph 5 of the First Amended Complaint, except that the legal title of this Court is the District Court for the Northern Mariana Islands. 48 U.S.C. § 1821(a).

**PARTIES**

6. Denies in paragraph 6 of the First Amended Complaint that Plaintiff Abu Yousuf (“Yousuf”) worked for and was an employee of Defendant Ranada, and worked and/or was suffered to work by Defendant Ranada. Admits that Plaintiff Yousuf is a citizen of Bangladesh and resided at all relevant times in the CNMI, and that he worked for or was an employee of one or more of the other Defendants, and worked and/or was suffered to work by one or more of the other Defendants.
7. Denies in paragraph 7 of the First Amended Complaint that Plaintiff Md. Rokonnurzzaman (“Rokonnurzzaman”) worked for and was an employee of Defendant Ranada, and worked and/or was suffered to work by Defendant Ranada. Admits that Plaintiff Rokonnurzzaman is a citizen of Bangladesh and resided at all relevant times in the CNMI, and that he worked for or was an employee of one or more of the other Defendants, and worked and/or was suffered to work by one or more of the other Defendants.
8. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments in paragraph 8 of the First Amended Complaint about Defendant LongFeng Corporation (“LFC”) and thus denies said averments.
9. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments in paragraph 9 of the First Amended Complaint about Defendant GuoWu Li (“Li”), and thus denies said averments.

10. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments in paragraph 10 of the First Amended Complaint about Defendant Xu Gui Qing (“Xu”), and thus denies said averments.
11. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments in paragraph 11 of the First Amended Complaint about Defendants Li and Xu, and thus denies said averments.
12. Denies in paragraph 12 of the First Amended Complaint that Defendant Ranada has ever done business as and/or operated and controlled NVM Security Services as his business and enterprise. Defendant Ranada worked for Aqua Resort from 1989 to 2014 as a security guard and security supervisor, *see Ranada v. Ken Aqua Hotel and Resort, Inc.*, No. 1:21-cv-00015 Complaint, ¶¶ 15 & 27 (D.N.M.I. Mar. 4, 2016), while employed by various manpower services, including N.V.M. Security Services Enterprises, *id.* at ¶¶ 12 & 16-18, until 2019. Admits that Defendant Ranada is a citizen of the Republic of the Philippines and resided at all relevant times in the CNMI.
13. Denies paragraph 13 of the First Amended Complaint. Plaintiffs and Defendant Ranada were all employees of N.V.M. Security Services Enterprises in 2018 and 2019. At some point in those years, Defendant Ranada was asked by his boss to post the Plaintiffs at XO Market, and did so.
14. Denies paragraphs 14-18 of the First Amended Complaint as to himself. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments with respect to the other Defendants, and thus denies said averments.

**STATEMENT OF FACTS**

**A. Plaintiff Abu Yousuf**

19. Denies paragraphs 19-22 of the First Amended Complaint as to himself. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments with respect to the other Defendants, and thus denies said averments.
23. Admits paragraph 23 of the First Amended Complaint as to himself, because he was not Yousuf's employer, but a fellow employee. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments with respect to the other Defendants, and thus denies said averments.
24. Denies paragraphs 24-25 of the First Amended Complaint as to himself. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments with respect to Defendant Xu, and thus denies said averments.
26. Denies paragraph 26 of the First Amended Complaint as to himself. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments with respect to the other Defendants, and thus denies said averments.
27. The allegations of paragraph 27 of the First Amended Complaint constitute a statement or conclusion of law (the federal minimum wage), rather than a statement of fact, to which no response is required.
28. Denies paragraph 28 of the First Amended Complaint as to himself. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments with respect to the other Defendants, and thus denies said averments.
29. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments in paragraph 29 of the First Amended Complaint about Defendant Xu, and thus denies said averments.

30. Admits paragraph 30 of the First Amended Complaint as to himself, because he was not Yousuf's employer, but a fellow employee. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments with respect to the other Defendants, and thus denies said averments.
31. Denies paragraph 31 of the First Amended Complaint as to himself. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments with respect to the other Defendants, and thus denies said averments.

**STATEMENT OF FACTS**  
**B. Plaintiff Md. Rokonnurzzaman**

32. Denies paragraphs 32-33 of the First Amended Complaint as to himself. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments with respect to the other Defendants, and thus denies said averments.
34. Admits paragraph 34 of the First Amended Complaint as to himself, because he was not Rokonnurzzaman's employer, but a fellow employee. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments with respect to the other Defendants, and thus denies said averments.
35. Denies paragraphs 35-36 of the First Amended Complaint as to himself. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments with respect to Defendant Xu, and thus denies said averments.
37. Denies paragraph 37 of the First Amended Complaint as to himself. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments with respect to the other Defendants, and thus denies said averments.

38. The allegations of paragraph 38 of the First Amended Complaint constitute a statement or conclusion of law (the federal minimum wage), rather than a statement of fact, to which no response is required.

39. Denies paragraph 39 of the First Amended Complaint as to himself. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments with respect to Defendant Xu, and thus denies said averments.

40. Denies paragraphs 40-51 of the First Amended Complaint as to himself. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments with respect to the other Defendants, and thus denies said averments.

**FIRST CAUSE OF ACTION**  
**(Failure to Pay Minimum / Applicable Wages  
in Violation of FLSA)**

52. Paragraphs 1-40 of Defendant Ranada's Answer to the First Amended Complaint are incorporated by reference.

53. Denies paragraphs 53-55 of the First Amended Complaint as to himself. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments with respect to the other Defendants, and thus denies said averments.

**SECOND CAUSE OF ACTION**  
**(Failure to Pay Minimum / Applicable Wages  
in Violation of MWSHA)**

56. Paragraphs 1-53 of Defendant Ranada's Answer to the First Amended Complaint are incorporated by reference.

57. Denies paragraphs 57-59 of the First Amended Complaint as to himself. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments with respect to the other Defendants, and thus denies said averments.

**THIRD CAUSE OF ACTION**  
**(Failure to Pay Overtime Wages  
in Violation of FLSA)**

60. Paragraphs 1-57 of Defendant Ranada's Answer to the First Amended Complaint are incorporated by reference.

61. Denies paragraphs 61-63 of the First Amended Complaint as to himself. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments with respect to the other Defendants, and thus denies said averments.

**FOURTH CAUSE OF ACTION**  
**(Failure to Pay Overtime Wages  
in Violation of MWSHA)**

64. Paragraphs 1-61 of Defendant Ranada's Answer to the First Amended Complaint are incorporated by reference.

65. Denies paragraphs 65-67 of the First Amended Complaint as to himself. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments with respect to the other Defendants, and thus denies said averments.

**FIFTH CAUSE OF ACTION**  
**(Unlawful Retaliation in Violation of FLSA)**

68. Paragraphs 1-65 of Defendant Ranada's Answer to the First Amended Complaint are incorporated by reference.

69. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments in paragraphs 69-70 of the First Amended Complaint about Defendant Xu, and thus denies said averments.
71. Denies paragraphs 71-72 of the First Amended Complaint as to himself. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments with respect to Defendant Xu, and thus denies said averments.
73. Denies paragraphs 73-76 of the First Amended Complaint as to himself. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments with respect to the other Defendants, and thus denies said averments.

**SIXTH CAUSE OF ACTION**  
**(Fraud and Deceit and/or Theft of Labor and Services)**

77. Paragraphs 1-73 of Defendant Ranada's Answer to the First Amended Complaint are incorporated by reference.
78. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments in paragraphs 78-84 of the First Amended Complaint about Defendant Xu, and thus denies said averments.
85. Denies paragraph 85 of the First Amended Complaint as to himself. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments with respect to Defendant Xu and the other Defendants, and thus denies said averments.
86. Denies paragraphs 86-91 of the First Amended Complaint as to himself. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments with respect to the other Defendants, and thus denies said averments.



**SEVENTH CAUSE OF ACTION**  
**(Equitable Relief / Quantum Meruit / Unjust Enrichment)**

92. Paragraphs 1-86 of Defendant Ranada's Answer to the First Amended Complaint are incorporated by reference.

93. Denies paragraphs 93-95 of the First Amended Complaint as to himself. Defendant Ranada is without knowledge and information sufficient to form a belief as to the truth of the averments with respect to the other Defendants, and thus denies said averments.


96. Denies all allegations and inferences not specifically admitted herein.

WHEREFORE, Defendant Ranada respectfully requests:

- a. That no judgment be entered against him and that this action be dismissed with prejudice as to him.
- b. Any other such relief as the Court deems just and equitable.

DATED, this 7th day of December, 2021.

Respectfully submitted,

  
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Feloteo V. Ranada  
Defendant Pro Se

PREPARED BY: MARIANAS OFFICE – MLSC